

**IN THE U.S. DISTRICT COURT FOR MARYLAND,  
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.	)	
	)	
Plaintiff	)	
v.	)	Case No.PJM 08 cv 0921
	)	
WORLD AVENUE USA, LLC, et al.	)	
Defendants	)	
_____	)	

**JOINT MOTION FOR MODIFICATION OF SCHEDULING ORDER**

Pursuant to the orders issued on April 28 and May 6, 2009, Plaintiff, Beyond Systems, Inc. and Defendant, World Avenue USA, LLC, through their undersigned counsel, respectfully request that the Court modify the deadlines set forth in the Pretrial Scheduling Order.

Each side has taken one deposition of the other, although these depositions have been limited in scope: Plaintiff's deposition of defendant World Avenue Holdings, LLC was for purposes of personal jurisdiction; Defendant WAUSA's deposition of Plaintiff was to identify ESI information. The parties have exchanged written discovery requests on the merits and are in the process of arranging additional depositions.

A motion to dismiss Defendant World Avenue Holdings remains pending, and has been the focus of considerable briefing, including a second round of memoranda. The outcome of that motion will impact further discovery. It is apparent that the quantity of information and documents (electronic or paper) involved in this case will be substantial.

Defendants have filed a third-party complaint, have served approximately 40 non-parties with subpoenas, and have taken action to enforce those subpoenas including a separate action in the U.S. District Court for the District of Columbia.

The scheduling order was previously modified once, by joint motion filed at docket 64 and granted at docket 65. Given the status of discovery and the pending motions, the current deadlines are not practical.

The parties have conferred and have agreed to request the following new deadlines:

Event	Prior deadline	Requested new deadline
Joinder of additional parties and amendment of pleadings	August 7, 2009	January 19, 2010
Plaintiff's Rule 26(a)(2) expert disclosures	August 25, 2009	March 1, 2010
Defendant's Rule 26(a)(2) expert disclosures	September 22, 2009	April 1, 2010
Plaintiff's rebuttal Rule 26(a)(2) expert disclosures	October 6, 2009	April 20, 2010
Rule 26(e)(2) supplementation of disclosures and responses	October 13, 2009	May 10, 2010
Discovery deadline; submission of status report	January 10, 2010	June 21, 2010
Requests for admission	January 17, 2010	July 7, 2010
Dispositive pretrial motions	February 12, 2010	July 27, 2010
Pretrial conference	To be set	To be set

**Stephen H. Ring, P.C.**

**Greenberg Traurig, LLP**

\_\_\_\_\_/s/\_\_\_\_\_  
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Signature of Mr. Saunders above is pursuant to authority from Mr. Saunders to Mr. Ring for purposes of this filing.

\_\_\_\_\_/s/\_\_\_\_\_  
 Stephen H. Ring